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Port of Seattle

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Environmental Protection Agency, Region X
Attn: Dave Croxton, Waste Management Branch
1200 Sixth Avenue
Seattle, Washington 98101

FILE COPY

Dear Mr. Croxton,

Referance: Burlington Pier 91 Facility

The attached information on Terminal 91 is a brief outline of potential contamination sites and other areas of potential interest possibly not included in the current Burlington EPA 3008 h investigation. This provides in written form with followup details, points discussed in our meeting of June 1992. Many of these are covered in the bibliorgaphy documents or other programs, and their mention here and inclusion on the map are to locate them in the context of the entire facility.

Interviews with employees;

The interviews with employees and past employees only echoed the documents of the poorly maintained condition of the facility referenced in the file (biblio. ref. page 5 "Burlington Lease Area/ Port of Seattle files") from the mid 70's when the Port notified Chempro of its concern with the sloppy maintainence of the facilities and changed its lease language to more clearly make Chempro responsable for the regulatory liability of its operation.

Information annotated on the map provided:

1. Pipeline Breaks;
   - 1.1) '84 in road, oil noted in excavations for pipeline repair (Hotchkiss pers. comm.)
   - 1.2) PNOC. brk/pond seep, (biblio. ref. page 1 "PANOCO Line Breaks ")
   - 1.3) PNOC. S. of bldg.no. T-38, (biblio. ref. page 1 "PANOCO...")
   - 1.4) PNOC. N. of control tower, (biblio. ref. page 1 "PANOCO...")

2. Port tank program

Removed, abandoned and existing tanks noted on the drawing as notes T-91a through T-91o. See appendix A for more detailed list of size, fuel, and removal schedule.

3. Misc. petroleum hydrocarbon noted in soils;

3.1 Area of sludge disposal by Chempro on railroad tracks and sludge ponds noted in early 1970's, (biblio. ref. page 5 "Burlington Lease Area/ Port of Seattle files"). In the April 1989 Chempro investigation, a sample (SB-2-A) in this area showed very high levels of volatile organics (ex. 480ppm xylene, 16ppm benzene, 12ppm tetrachloroethene) in a gravelly sand perched on a layer of concrete just below the paved surface. That "hit " was disregarded as probably due to Burlington Northern railyard contamination and not indicative of Chempro operation.

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3.2 Soils excavated for sewer connection by Chempro, volitle petroleum hydrocarbon odor noted by Port. Samples taken. High BETX values noted, 1987 , (biblio. ref. page 5 "Burlington Lease Area/ Port of Seattle files").

3.3 Noted in discussion, free product noticed in excavations for foundation footings for new chill building W-390, 1988. (Hotchkiss pers. comm.)

3.4 Eleven inches of free product found in upstream "background " well for small diesel tank (T-91n) removal, 1989, (biblio. ref. page 4 "Tanks Harding Lawson Assoc. 1990").

3.5 Hydrocarbon odors noted during geotech soils borings for new Elliott Bay Marina access ramps, 1991.(Hotchkiss pers. comm. from GeoEngineers)

3.6 Petroleum hydrocarbons noted in test borings for new concrete aprons. Backhoe excavation for contamination removal finds only old asphalt and creosoted timbers in fill, 1992. (Hotchkiss pers. comm. data report in process)

3.7 petroleum hydrocarbon noted on soils grains in trench excavated for relocation of storm drain in 1985. (Hotchkiss pers. comm.)

3.8 petroleum hydrocarbon noted on soils grains and slick on water in excavations for new light standards in 1985. (Hotchkiss pers. comm.)

4. Old Tank Farm

Additional tank farm north of Pier 91 and west of existing tank farm, as evidenced in Port and Navy drawings. Installed in the late 20's or early 30's earliest ref is '31. Apparently demolished by the Navy some time after '42. Referance drawings 7 and 8 supplied by the Port in Aug. 1992.

5. Storm drain and CSO Problems;

5.1) At the North end, a small storm drain enters the Port property from the Burlington Northern railyard connects to several catch basins on the Port property, and exits north. It originally drained into the City of Seattle's vactor truck dump site. In the late 80's, problems had been noted, by Ecology. Upon investigatin I discovered oil collecting in the first access/catchbasin on the Port property. This had evidently come from the B.N. property. The Port cleaned the catch basin. When the City rebuilt and lined this facility in about 1989/1990 they closed that drain. This caused backup on the Port property. The City reopened the north exit of the line.

5.2) At the South end, there is a 92" storm drain/CSO (City of Seattle "Interbay" CSO). This large stormdrain/CSO enters the head end of the 89/90 slip. In the later 80's there were increasing problems with oily discharge from this drain. This was finally traced to the storm drain line connecting the system to the B.N. rail yard drainage. Investigation in the B.N. yard by Dan Cargill of Ecology and the U.S. Coast Guard revealed a large quantity of oil entering the storm drain system through saturated soils caused by a leaking presurized oil line for fueling the heaters in the cabooses. This line had apparently been severly corroded by acid from the maintenance practices on the batteries of the diesel/electric locomotives. The leaking line was fixed by B.N. and oil was removed form the storm drain system, stopping this problem.

6.Vactor Truck Dump Site

Immediatly north of the Port's Terminal 91 property in the City of Seattle's Halladay Street right of way, between 20 th and 21st, is the City's Halladay Street vactor truck dump site. This dump site has been active for many years. Untill about 1989/1990 this dump site was an unlined pit that overflowed into a series of two small connected ponds described by Dan Cargill of Ecology as a "maximilly degraded wetland". This then drains into the stormwater system on the west side of T-91 and exits into the Sound through a 44" pipe at the head end of the 91 West slip. The contaminated water in these ponds is potentially a contaminate source for T-91 ground water.

7. Old Tide Marsh Layers.

In about 1990 I oversaw the excavation of a proposed underground storage tank location on the western edge of the uplands of the terminal. This excavation uncovered a layer of native plant organic debris that included some rubbish (rags, cans, etc.) at the level of the old intertidal marsh. The marsh had been filled in to create the the terminal in the 1920's and 1930's. This layer was approx. 1 ft. or less thick, but undoubtedly is extensive over much of the terminal. Based on past experiance of the Port and others this type of organic matter will give values in the 418.1 TPH analysis over the states MTCA cleanup levels even with no petroleum hydrocarbons present. This potential source of interferance needs to be recognised in any investigation of the area.

8. Short Fill, Contaminated Dredged Material Disposal Site

The areas between piers 90 and 91 at the head end of the slip were filled in with mildly contaminated dredged material behind clean structural fill berms and under approximatly 16 feet of clean structural fill cap. This was a local, state, and federally permitted activity, and has been subject to extensive monitoring for the past six years. The final summary conclusion report will be available this month.

9. Concrete "Old Oil Tank" in Pier 90 Foundation

On the west side of Pier 90, under what was the floor of wharehouse number 7, there are two large concrete tanks (each tank has 8 cells measuring 36 feet by 12 feet by about 5 feet deep) built into the existing pier substructure. The contents of the tanks were inspected, through a small access port, visually and by lowering and retriving a rag. By this procedure, the tank was estimated to be empty except for a small amount of water in the bottom, no traces of petroleum products were found. Subsequently, an old drawing was discovered that labeled the tanks as "old oil tanks". Further investigation found the probable date of construction of the tank to be coincident with the original pier, around 1915 to 1916. The use of the tanks was for the importation of bulk soybean oil from Japan (from "A History for The Port of Seattle" by Padraic Burke).

This concludes the narrative outline of potential areas of interest outside the Chempro/Burlington scope area. Some of the areas of interest clearly or potentially relate to past Chempro/Burlington operations, but presently may not be included in the current scope of Chempro studies. Also some of these are covered in the bibliorgaphy documents or other programs, such as the tank program and the Short Fill, Contaminated Dredged Material Disposal Site Program, They are included here not because they are cause for probable concern, but for a comprehensive picture of all areas of potential regulatory interest and involvement on this property.

Thank you for your patience and cooperation. If you have any additional questions please feel free to call me at 728-3192.

Sincerely,

Douglas A. Hotchkiss

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DAH

Appendix A
TERMINAL 91 TANK LIST

Old Tanks Removed Or To Be Removed

Tank id. size gal	actv/abnd/rmvd type & notes		prop. removal date	
T-91a	actv	early 1994	3000	gas
T-91b	actv	early 1994	7000	gas
T-91c	actv	early 1994	10000	gas
T-91d	abnd	early 1994	10000	diesel
T-91e	abnd	early 1994	10000	diesel
T-91f	abnd	early 1994	10000	diesel
T-91g	abnd	early 1994	10000	gas ?
T-91h	actv	early 1994	12000	heavy oil, boiler
T-91i	abnd	early 1994	672	diesel, closed in place
T-91j	actv?	? see Chempro	??	oil/ water seperator
T-91k	actv	early 1993	500	diesel, boiler
T-91l	abnd?	? see Chempro	??	oil/ water seperator
T-91m	rmvd	7/1987	300	diesel
T-91n	rmvd	12/1989	672	diesel
T-91o	rmvd	by Chempro?	500	gas ?

T-91p through T-91s are exempt piping

new Tanks to be installed:

Tank id.	prop. install date/use	size gal	type & notes
T-91t	late 1992/to replace T91a	1100	gas
T-91u	early 1993/to replace T91k	500	abovegrnd. diesel
T-91v	late 1993 to replace T-91b&c	10000 to 20000	gas